

# EXHIBIT C

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION

JOHN DOE	)	Case No.
	)	
<i>Plaintiff,</i>	)	
v.	)	Civil Action No.
	)	
ALTHEA AZEFF	)	
	)	<i>Electronically Filed</i>
<i>Defendant</i>	)	
	)	
	)	
	)	
	)	

## DECLARATION OF PLAINTIFF'S FATHER

- 1) My name is [REDACTED]. I am over eighteen (18) years of age, competent to make this declaration, and not disqualified by law from doing so. I have direct, personal knowledge of the facts asserted in this declaration.
- 2) I am the father of the plaintiff, [REDACTED], in the above-captioned case of John Doe vs Althea Azeff.
- 3) I am the ex-husband of the defendant Althea Azeff. I was married to Althea Azeff for over two years.
- 4) In January 2021, I became aware of a statement written by Althea Azeff, timestamped by the court as being submitted on January 14, 2021.
- 5) In May 2021, I became aware of a book written by Althea Azeff, titled [REDACTED]  
[REDACTED]
- 6) In her statement and book, Althea Azeff made a wide variety of false statements concerning [REDACTED].
- 7) In her statement and book, Althea Azeff made false statements concerning myself.

- 8) In her book, Althea Azeff purported that I have expressed early “criminal tendencies.” This is false and defamatory. I have never expressed criminal tendencies as purported by Althea Azeff, nor do I engage in criminal behavior.
- 9) In her book, Althea Azeff purported that I have called her a “dirty Jew”, “gypsy”, “loser”, and “a woman whose own family did not even want her.” I have never referred to Althea Azeff by any of those terms.
- 10) In her book, Althea Azeff accuses me of raping her, date raping her, and otherwise engaging in exploitative romantic practices.
- 11) I have never engaged in any non-consensual or otherwise exploitative romantic, intimate, or sexual encounter with Althea Azeff.
- 12) I have never raped or date raped Althea Azeff.
- 13) Around the time that [REDACTED] was conceived, Althea Azeff informed me that she could not become pregnant due to medical reasons. Althea Azeff consented to all sexual interactions between the two of us and never expressed any hesitation or discomfort as purported by her in her book. In fact, Althea Azeff was an active and enthusiastic participant during the described encounter.
- 14) I value sexual consent. If I felt that Althea Azeff was not engaged or comfortable with any action, I would certainly stop engaging in that action.
- 15) To the best of my knowledge, [REDACTED] did not fabricate that he has a history of problematic porn use, nor has he engaged in fraudulent behavior, bullying, or the other unsavory behavior regarding his porn addiction recovery support group, as purported by Althea Azeff.

- 16) I have met Althea Azeff's adoptive parents, Trudi Azeff and Joel Azeff, and we stayed with them at their house on a few occasions.
- 17) I am unaware of any attempt by Trudi Azeff or Joel Azeff to take or kidnap [REDACTED], as purported by Althea Azeff.
- 18) While I do not have any knowledge regarding Althea Azeff's claims that her adoptive family defrauded her by misusing her credit cards, I am aware that Althea Azeff told me a story that she and a boy went to New York and fraudulently spent over 10,000 dollars on the credit cards of her adopted parents.
- 19) I am unaware of any time that [REDACTED] has isolated, prevented from leaving, or otherwise engaged in physical or emotional abuse of any girlfriend. Based on my interactions with [REDACTED] and the person Althea Azeff is alluding to, I do not believe that these assertions by Althea Azeff are true.
- 20) I have never witnessed [REDACTED] expressing support for the "Proud Boys" or any hate group. Based on my experiences with [REDACTED], I do not believe that these assertions by Althea Azeff are true.
- 21) I have never witnessed [REDACTED] utilize the phrases "dirty Jew" or "cheap Jew" or otherwise denigrate Jewish people. Based on my experiences with [REDACTED], I do not believe that these assertions by Althea Azeff are true.
- 22) I have never heard [REDACTED] express disdain for people of "other emerging genders, people in transition, and several additional groups of others." I have never heard [REDACTED] express discriminatory viewpoints. Based on my experiences with [REDACTED], I do not believe that these assertions by Althea Azeff are true.

- 23) While I decided to send [REDACTED] to private school for smaller classes and a more structured environment, I never felt or expressed that the purported “diversity” or “roughness” was a factor in this decision, as purported by Althea Azeff.
- 24) I have never supported Althea Azeff engaging in massage, erotic, or sex work/prostitution services.
- 25) When Althea Azeff expressed a desire to engage in massage services, I did not support her idea.
- 26) Althea Azeff repeatedly expressed a lack of desire to work low paying jobs, which was the reason she relayed to me for initiating her underwear massage proprietorship.
- 27) While Althea Azeff purports to have only performed massages while wearing lingerie in her book, at some point I learned that she had full sexual intercourse with at least several of her clients. She relayed this information to me one night after arriving back at our apartment. I am unaware of exactly how many massage clients she engaged in sexual intercourse with. Learning that Althea Azeff was secretly engaged in sex work caused me great distress, leading me to cry, leave our apartment for days, and sleep inside the [REDACTED] building.
- 28) I never disclosed Althea Azeff’s history of providing massage and sex work services to parents at [REDACTED] school or scouting troop. Further, I have never disclosed this to [REDACTED], until recently.
- 29) I have never engaged in tax evasion or otherwise dishonest tax reporting. I am also unaware of any tax evasion that Althea Azeff purports that [REDACTED] committed.
- 30) I had never discussed sterilization of [REDACTED] with Althea Azeff.

- 31) I have never referred to [REDACTED] as “mentally disturbed”, a “pathological liar”, a “tyrant”, “manipulative”, or otherwise disparaged [REDACTED] to Althea Azeff in the manner that Althea Azeff described in her book.
- 32) To the best of my knowledge, I have been present at every in-person interaction that Althea Azeff has ever had with [REDACTED], including the first time they met as described in Althea Azeff’s book.
- 33) I have never witnessed [REDACTED] check Althea Azeff’s head for horns or otherwise witness [REDACTED] express any antisemitic viewpoints.
- 34) [REDACTED] was not involved in the planning or execution of any family court litigation against Althea Azeff while he was in middle school.
- 35) Up until recently, I have never spoken of Althea Azeff in a negative way to [REDACTED]. [REDACTED] I made this decision to avoid “parental alienation” and to allow [REDACTED] to have his own relationship with his mother.
- 36) [REDACTED] is not a “con artist” and does not engage in fraudulent behavior as described by Althea Azeff.
- 37) To the best of my knowledge, I was present at all mental health-related meetings that took place during [REDACTED] childhood.
- 38) It is not true that a psychiatrist or any other professional suggested that [REDACTED] should attend a residential therapeutic treatment school in Hershey, Pennsylvania for “very disturbed children,” nor was there any recommendation for [REDACTED] to attend any similar school.
- 39) No mental health professional recommended for [REDACTED] to be medicated as a child.

- 40) No mental healthcare professional during [REDACTED] childhood described [REDACTED] as having the various mental illnesses that Althea Azeff purports, nor has described [REDACTED] in the way that Althea Azeff purported.
- 41) [REDACTED] does not have a background of childhood mental health issues or diagnoses.
- 42) To the best of my knowledge, [REDACTED] does not have any of the mental health problems purported by Althea Azeff.
- 43) I have never committed any insurance fraud as purported by Althea Azeff.
- 44) I have never met the 2009 mass shooter George Sodini. I do not have any knowledge that would suggest that [REDACTED] had any knowledge of the attack prior to it occurring, or that he illegally hacked the killer's email account or personal data.
- 45) [REDACTED] was in the [REDACTED] area throughout October 2019, assisting in the care of a family member who had terminal cancer.
- 46) In my opinion, in her written statement and book, Althea Azeff described herself inaccurately as a wilting wallflower. For example, I have witnessed her intense feuds with neighbors (such as upstairs in [REDACTED]) and friends. I would describe her boundaries as the opposite of how she described them in her writings. Althea Azeff would often become enraged. One of my memories was waking up at night wanting to go to the bathroom, but I laid there still, in fear of waking her and being screamed at.
- 47) Althea Azeff's statement and book contains numerous other objectively false, misleading, and defamatory assertions regarding [REDACTED].
- 48) I have signed this affidavit of my own free will and have not been paid or otherwise coerced by Plaintiff, counsel for Plaintiff, or anyone else to sign it.

49) I declare under penalty of perjury that the foregoing is true and correct.

January 13<sup>th</sup> 2022  
Executed on

  
Plaintiff's Father